

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY

LOS ANGELES, CA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

DIRECT LINE: (202) 342-8518

EMAIL: tcohen@kelleydrye.com

February 15, 2017

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Filing of the American Cable Association on the Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On February 13, 2017, Ross Lieberman, Senior Vice President of Government Affairs, American Cable Association (“ACA”) and, by telephone, Micah Sachs, Cartesian, Consultant to ACA, and Thomas Cohen, Kelley Drye & Warren LLP, Counsel to ACA, met with Jay Schwarz, Wireline Advisor to Chairman Pai. On February 14, 2017, Ross Lieberman, Micah Sachs (by telephone), and Thomas Cohen met with Amy Bender, Legal Advisor, Wireline, to Commissioner O’Rielly, and Claude Aiken, Legal Advisor, Wireline, to Commissioner Clyburn. The purpose of the meetings was to discuss the methodology to weight bids in the Connect America Fund (“CAF”) Phase II competitive bidding process (or auction).¹

ACA representatives explained that by maximizing participation in the Phase II auction by bidders using all technologies, the Commission will best achieve its aims of providing consumers in unserved areas with a “reasonably comparable” broadband experience and distributing support most cost-effectively. ACA representatives further explained that the Commission’s decision to adopt a weighting methodology that will result in maximum

¹ *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 16-64, ¶¶ 205-229 (rel. May 26, 2016) (“CAF Phase II Auction Order”). *See also id.*, ¶¶ 14-18.

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participation should be based on a sound analytical framework and data that reflects the real world costs of deploying a network using each technology as applied to each of the census blocks eligible for support. ACA representatives submitted that the recommended weighting methodology it filed on January 30th would ensure significant, although not disproportionate, auction participation by all providers, including those seeking to deploy higher performance broadband networks.² ACA continues to evaluate its proposal to determine whether it can be refined to drive even greater participation. In contrast, methodologies proposed by other parties would unduly favor a limited number of technologies and thus would deter bidding by providers using “unfavored” technologies, which would not maximize participation and not achieve the Commission’s aims.³

This letter is being filed electronically pursuant to Section 1.1206 of the Commission’s rules.

Sincerely,



Thomas Cohen
Kelley Drye & Warren, LLP
3050 K Street N.W.
Washington, DC 20007
202-342-8518
tcohen@kelleydrye.com
Counsel for the American Cable Association

cc: Jay Schwarz
Amy Bender
Claude Aiken

² See *Ex Parte* Letter from Thomas Cohen, Counsel to the American Cable Association, to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (Jan. 30, 2017).

³ See, e.g., Reply Comments of USTelecom, WC Docket No. 10-90 et al. at 2-3 (Aug. 5, 2016).